

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

---

EPIC SYSTEMS CORPORATION, a  
Wisconsin Corporation,

Plaintiff,

Case No. 14-CV-748-WMC

v.

TATA CONSULTANCY SERVICES  
LIMITED, an Indian Corporation; and TATA  
AMERICA INTERNATIONAL  
CORPORATION (dba TCS AMERICA), a  
New York Corporation,

Defendants.

---

**DECLARATION OF BRETT REHM**

---

1. I, BRETT REHM, am the director for technical services for Epic Systems Corporation. I make this declaration in support of Epic's opposition to TCS's motion to compel discovery. Except as otherwise stated, I have personal knowledge of the contents of this declaration, and I can testify competently to them if called upon to do so.
2. Epic develops and sells an integrated suite of medical software used by hospitals, medical groups, and healthcare organizations to support. Epic's software is recognized in the industry as a market leader because of our high quality, innovative software that meets our customers' requirements and desires.
3. Epic utilizes a web portal called "Galaxy" to provide customers with access to detailed documentation about Epic's software. These documents include information regarding the implementation, training, setup, support, configuration, maintenance and operation of Epic's medical software. These documents and materials contain as complete description of the

software features and functions as would be necessary for a customer to successfully perform the implementation, training, setup, support, configuration and maintenance of the Epic software.

4. Galaxy provides access to detailed, end-user documentation necessary for training and end user support. This documentation includes workflow descriptions, examples and configurations. This documentation also includes depictions of the user interfaces for Epic's software as well as explanations and instructions on how to use them.

5. In addition to the various, end user documents, Galaxy provides access to a vast array of highly technical descriptions of features, functionalities, data models, workflows, and software configurations. The documents include information about the setup and configuration of various aspects of the technical infrastructure necessary to support and deploy Epic software. These documents and materials include code, SQL queries, and other coding information.

6. It is my understanding that our customer's rely on the documents and materials available on Galaxy during their implementation, support, configuration, and maintenance of Epic's software. It is also my understanding that our customers use the documents and materials available in Galaxy to assist in the design and development of their custom development and to interface their software with other third party systems.

7. I have read TCS's document requests numbered 49-52.

8. Kaiser Permanente is an enterprise licensee of Epic's software. As such, Kaiser has licensed and implemented nearly all of Epic's software modules. Kaiser calls their Epic deployment KP HealthConnect.

9. It is my understanding that the document requests would encompass many hundreds of thousands of documents, if not nearly all technical materials created in the design, development and enhancement of Epic's software as those would constitute "any other

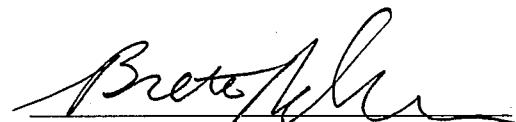
documentation describing the details of all modules, functions and options of KP HealthConnect.”

10. It is also my understanding that the requests would include nearly every communication between Epic and Kaiser since Kaiser implemented Epic in 2003. Such documents would be included in “[a]ll documents that refer or relate to recommendations provided by Epic to Kaiser addressing methods, procedures, tools, and best practices for ongoing testing and validation of Epic system deployments.”

11. Identifying, collecting and reviewing all of the documents would require hundreds of people hours, if not more. It may involve Epic staff from dozens of various teams including most of the software development and quality assurance teams. In addition, at least one request, would require collecting emails and documents the hundreds of technical support and implementation team members who have supported Kaiser Permanente over the past decade.

I declare and affirm under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed this 14<sup>th</sup> day of JANUARY, 2016, in Verona, Wisconsin.



Brett Rehm

